

The Honorable Jessica G. L. Clarke  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York NY, 10007

**MEMO ENDORSED**

**Re: Rapaport v. Epstein, 24-cv-07439**

**Letter-Motion For Extension of Time to Respond and to Toll IPR 4(e) Period**

Your Honor:

I am respectfully writing to request an extension of time to respond to the motions to dismiss filed by defendant Pallaki individually and jointly by defendants Iyer, Garrett, Weinberg and Nelms.

The due date is currently 2/27/2025 and I am respectfully requesting for it to be extended to 3/27/2025. This represents an extension of four weeks or precisely 28 days. This is my first request for an extension of this deadline. The reason for this extension is that I have received a significant amount of information since commencing this action, including with respect to transactions and occurrences which had not yet transpired at that time, and that I must perform all work alone as a *pro se* litigant. I have conferred with the aforementioned defendants and have obtained their consent for this extension with respect to the time to respond.

In congruence with such an extension of time to respond, I am also requesting that Your Honor toll the period for notice of an amendment of my pleading established by your Individual Practice Rule 4(e) I may make per FRCP Rule 15(a)(1)(B) so that it will end on 3/23/2025. This will match the extension for the deadline for response, and provide me with sufficient time to evaluate the motions filed in light of information received since the filing of the *Complaint*, including with respect to new transactions and occurrences.

Respectfully submitted,

/s/ Gideon Rapaport *pro se*  
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Plaintiff's request for additional time to file an opposition to the pending motions to dismiss is GRANTED, and he shall file any opposition by **March 27, 2025**. However, Defendant Pallaki and Defendants Iyer, Garrett, Weinberg, and Nelms are directed to state their position regarding Plaintiff's request for an extension to file an amended pleading. Defendants shall indicate their position, in a letter, on or before **February 26, 2025**, or else the request will be treated as unopposed. The request is taken under advisement until that time.

Dated: February 24, 2025  
New York, New York

SO ORDERED.



JESSICA G. L. CLARKE  
United States District Judge